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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$55,535.00 IN
U.S. CURRENCY,

APPROXIMATELY \$20,480.00 IN
U.S. CURRENCY,

APPROXIMATELY \$6,100.00 IN
U.S. CURRENCY, AND

APPROXIMATELY \$1,004.00 IN
U.S. CURRENCY,

Defendants.

2:24-MC-00100-DJC-AC

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant
Adriana Jones, appearing *in propria persona*, as follows:

1. The United States and Claimant Adriana Jones ("Claimant"), one of the plaintiffs in the
civil action in *Miller, et al. v. Juarez Cartel*, United States District Court for the District of North Dakota
Civil Action No. 1:20-cv-132, agree to extend the deadline for the United States to file judicial forfeiture
proceedings against the assets discussed below.

2. Claimant filed more than 1,200 claims in nonjudicial civil forfeiture proceedings initiated

1 by the Drug Enforcement Administration (“DEA”) and Customs and Border Protection (“CBP”).¹ One
2 of those claims relates to the above-captioned assets potentially subject to judicial forfeiture in the
3 Eastern District of California (the “defendant currency”). Claimant intends this agreement to apply to all
4 claims filed by Claimant.

5 3. DEA and CBP have referred or are in the process of referring the claims to United States
6 Attorney’s Offices.

7 4. Pursuant to 18 U.S.C. § 983(a)(3)(A) and (B), the United States has 90 days from its
8 receipt of a claim in a nonjudicial forfeiture proceeding to initiate a judicial forfeiture proceeding against
9 the defendant currency. This deadline is known as the CAFRA deadline.

10 5. On November 15, 2023, Claimant agreed to extend to February 29, 2024, the CAFRA
11 deadline for those assets that would otherwise have an earlier CAFRA deadline.

12 6. On December 29, 2023, Claimant filed additional claims to other assets proceeding
13 through nonjudicial civil forfeitures. Those assets have a March 28, 2024, CAFRA deadline.

14 7. As provided in 18 U.S.C. § 983(a)(3)(A), Claimant and the United States have agreed to
15 extend the time within which the United States may file a judicial action for forfeiture against the
16 defendant currency to give the parties sufficient time to try to resolve these matters.

17 8. Claimant knowingly, intelligently, and voluntarily gives up any right she may have under
18 18 U.S.C. § 983(a)(3)(A)-(B) to require the United States to file a judicial forfeiture against the defendant
19 currency covered by this agreement on or before the deadline referenced in paragraphs 5 and 6 and any
20 right that she may have to seek dismissal of any judicial forfeiture action on the ground that it was not
21 timely filed.

22 9. Claimant and the United States agree, that in the event the Claimant seeks to file an
23 amended claim, the United States will not argue that the amended claim is untimely during the course of
24 the agreed upon extension. Claimant and the United States further agree, that in the event that Claimant
25 does file an amended claim, and the amended claim filed by Claimant is co-signed by, and submitted on
26

27 ¹ The other plaintiffs in *Howard Miller, et al. v. Juarez Cartel* intended to file claims in the DEA
28 and CBP nonjudicial forfeiture proceedings. Since DEA and CBP determined that Claimant was the only
plaintiff who filed a timely, valid claim, only her consent is necessary to extend the deadline set out in 18
U.S.C. § 983(a)(3)(A).

1 behalf of, all plaintiffs in *Howard Miller, et al. v. Juarez Cartel*, the United States will not argue that the
2 amended claim of all plaintiffs is untimely during the course of the agreed extension.

3 10. Claimant has consulted with counsel for the *Miller* plaintiffs, Michael Elsner of Motley
4 Rice and Samuel Mitchel of Mitchell & Mitchell, and counsel has authorized Claimant to represent that
5 counsel also consents to this extension of time.

6 11. Claimant and the United States agree to extend the deadline by which the United States
7 may timely file a judicial forfeiture against the defendant currency until April 30, 2024. In the event the
8 April 30, 2024, deadline is not met, Claimant and the United States agree that the Claimant may assert
9 any rights she may have under 18 U.S.C. § 983(a)(3)(A)-(B) to require the United States to file a judicial
10 forfeiture against the defendant currency covered by this agreement.

11 Dated: 3/6/2024

PHILLIP A. TALBERT
United States Attorney

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13 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

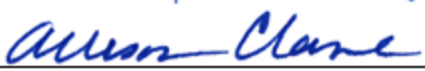
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15 Dated: 2/22/2024

/s/ Adriana Jones
ANDRIANA JONES
Potential Claimant, appearing *in propria persona*
28 Bridgeside Blvd.
Mount Pleasant, SC 29464

18 (Signature retained by attorney)

19
20 **IT IS SO ORDERED.**

21 Dated: March 7, 2024

22 
23 ALLISON CLAIRE
24 UNITED STATES MAGISTRATE JUDGE
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